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ATTORNEYS FOR DEFENDANTS

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

MOTI SHIPPING LTD.,

Plaintiff,

– against –

DNV GL GROUP AS f/k/a DET NORSKE  
VERITAS AS, DNV GL AS, DET NORSKE  
VERITAS (USA) INC., #50, unknown  
companies in the DNV GL GROUP as  
corporate family,

Defendants.

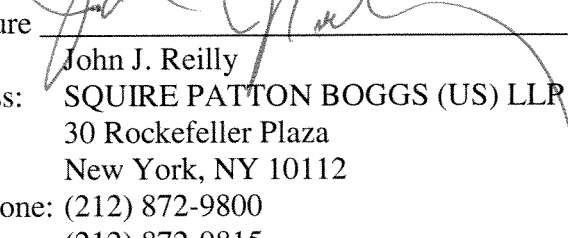
**Civil Action No. 1:16-cv-00138-RA**

**MOTION**

**PLEASE TAKE NOTICE** that upon the annexed Declaration of **GEIR DUGSTAD** affirmed on March 18, 2016, the Declaration of **ALLAN KROGSGAARD** affirmed on March 18, 2016, and upon the exhibits attached thereto, the accompanying Memorandum of Law in support of this motion, and the pleadings herein, Defendants will move this Court, before The Honorable Ronnie Abrams, United States District Judge, for an order pursuant to Rule 12(b)(1), 12(b)(2) and 12(b)(6) of the Federal Rules of Civil Procedure dismissing the Complaint of Moti Shipping Ltd. (“Moti” or “Owner”) (1) for lack of subject matter jurisdiction, (2) for lack of personal jurisdiction, (3) upon the doctrine of *forum non conveniens* because of a mandatory forum selection clause, and, (4) for failure to state a plausible claim for relief.

**I declare under penalty of perjury that the foregoing is true and correct.**

Dated: New York, New York  
March 21, 2016

Signature   
John J. Reilly  
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